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Attorneys for Defendants Power
Ventures, Inc. and Steve Vachani

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FACEBOOK, INC.,

Plaintiff,

-against-

POWER VENTURES, INC. d/b/a POWER.COM, a
California corporation; POWER VENTURES, INC.
a Cayman Island Corporation, STEVE VACHANI,
an individual; DOE 1, d/b/a POWER.COM, an
individual and/or business entity of unknown nature;
DOES 2 through 25, inclusive, individuals and/or
business entities of unknown nature,

Defendants.

Case No. 5:08-cv-05780 JW

**DECLARATION OF L. TIMOTHY
FISHER IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
FACEBOOK INC.'S MOTION TO
COMPEL PRODUCTION OF
DOCUMENTS AND DISCOVERY
RESPONSES**

Date: October 24, 2011
Time: 9:00 a.m.
Courtroom 15, 18th Floor
Judge James Ware

1 I, L. Timothy Fisher, declare as follows:

2 1. I am a partner at Bursor & Fisher, P.A., counsel of record for Defendants Power
3 Ventures, Inc. and Steve Vachani. I am an attorney at law licensed to practice in the State of
4 California, and I am a member of the bar of this Court. I have personal knowledge of the facts set
5 forth in this declaration and, if called as a witness, I could and would testify competently thereto.

6 2. Beginning on August 23, 2011, Facebook's expert Lawrence Melling spent more
7 than seven full days examining Power's source code.

8 3. On September 14, 2011, Power provided more than 1700 pages of Power's source
9 code to Facebook and its expert for their review pursuant to Section 8(d) of the Protective Order.

10 I declare under the penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct, executed on September 21, 2011 at Walnut Creek, California.

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L. Timothy Fisher